

ORIGINAL

BEFORE THE
POSTAL RATE COMMISSION
Washington, D.C. 20268-0001

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OFFICE OF THE SECRETARY

SPECIAL SERVICES REFORM, 1996

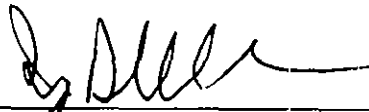
Docket No. MC96-3

AMERICAN BANKERS ASSOCIATION
INTERROGATORIES TO UNITED STATES POSTAL SERVICE
WITNESS RICHARD PATELUNAS
(ABA/USPS-T5-1-3)

July 16, 1996

In accordance with section 25 of the Rules of Practice, the
American Bankers Association hereby submits interrogatories.

Respectfully submitted,



Irving D. Warden
Associate General Counsel

Docket No. MC96-2

ABA/USPS-T5-1. Please refer to Appendix B of your testimony at Page 1 of 7 labeled "Cost Adjustments at Proposed PO Box Rates."

a. Please confirm that the first entry on the referenced page, labelled "FC Single Piece" reflects that 12.04% of the total First-Class single piece volume is delivered through a post office box.

b. Please confirm that the second entry on the referenced page labelled "FC Presort" reflects that 8.17% of the total First-Class presort volume is delivered through a post office box.

c. What percentage of the total volume of mail delivered through post office boxes is First-Class Mail?

d. What percentage of the total volume of mail delivered through caller service is First-Class Mail?

ABA/USPS-T5-2

a. What delivery costs are avoided when mail is delivered through post office boxes?

b. What is the total amount of delivery costs avoided by mail delivered through post office boxes?

c. Please compare the per-piece delivery costs of mail delivered through post office boxes with the per-piece delivery costs of mail delivered by other methods.

ABA/USPS-T5-3

a. What delivery costs are avoided when mail is delivered through caller service?

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b. What is the total amount of delivery costs avoided by mail delivered through caller service?

c. Please compare the per-piece delivery costs of mail delivered through caller service with the per-piece delivery costs of mail delivered through other methods.

CERTIFICATE OF SERVICE

I hereby certify that I have this date caused the foregoing document to be served upon all participants of record in this proceeding in accordance with Section 12 of the Rules of Practice. For participants listed on the service list as willing to receive electronic service, service has been made in accordance with procedure 3 as set out in Special Rule of Practice 3. B.



Irving D. Warden

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